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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JEFFRY HILL,  
  
Defendant.

No. 16-CR-454 RS

**STIPULATION AND ~~[PROPOSED]~~  
ORDER TO CONTINUE STATUS  
CONFERENCE**

**I. STIPULATION**

The parties in this case agree and jointly request the Court to move the status conference scheduled in the above captioned case from January 17, 2016 to February 7, 2016 at 2:30 p.m. The reason for this request is that defense counsel requires additional time to review discovery, which to date includes over 17,000 pages of accounting records, over 10,000 pages of other paper discovery, and audio recordings and electronic device data. The next available date for all parties is February 7th. The parties attempted to find an earlier date however the Court is

1 unavailable the week before, defense counsel is unavailable two weeks before, and the defendant  
 2 has a medical appointment three weeks before.

3 The parties concur that granting the exclusion would allow the reasonable time necessary  
 4 for effective preparation of counsel and continuity of counsel. *See* 18 U.S.C. §  
 5 3161(h)(7)(B)(iv). The parties also agree that the end of justice served by granting such an  
 6 exclusion of time for the purposes of effective preparation of counsel outweigh the best interest  
 7 of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).  
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 10 DATED: January 10, 2017

\_\_\_\_\_/s/\_\_\_\_\_  
 BENJAMIN KINGSLEY  
 Assistant United States Attorney

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 12  
 13 DATED: January 10, 2017

\_\_\_\_\_/s/\_\_\_\_\_  
 GALIA AMRAM  
 Attorney for Defendant Jeffrey Hill

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 18 ~~PROPOSED~~ ORDER

19 For the reasons stated above the Court hereby CONTINUES the status hearing in the  
 20 <sup>January</sup> ~~February~~ 17, 2017 to February 7, 2017. The Court further finds that  
 21 the exclusion from the time limits of this period applicable under 18 U.S.C. § 3161 is warranted  
 22 and that the ends of justice served by the continuance outweigh the best interests of the public  
 23 and the defendant in a speedy trial. Denying the requested exclusion of time would deprive the  
 24 defendant effective preparation of counsel, taking into account the exercise of due diligence. 18  
 25 U.S.C. § 3161(h)(7)(B)(iv).  
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27 IT IS SO ORDERED.  
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1 DATED: 1/11/17



2 THE HONORABLE RICHARD SEEBORG  
3 United States District Judge  
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